

MELINDA HAAG (CABN 132612)
 United States Attorney
 JOANN M. SWANSON (CABN 88143)
 Chief, Civil Division
 JENNIFER S WANG (CABN 233155)
 Assistant United States Attorney

U.S. Attorney's Office/Civil Division
 450 Golden Gate Avenue, 9th Floor
 San Francisco, California 94102-3495
 Telephone: (415) 436-6967
 Facsimile: (415) 436-6748
 Email: jennifer.s.wang@usdoj.gov

Attorneys for Federal Cross-Defendants
 West County Health Centers, Inc., Trina Bowen, M.D.
 and United States of America

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

JASPER GONZALES, by his Guardian Ad
 Litem, JENNA GONZALES,

Plaintiffs,

v.

RICK SIMONS, FURTADO, JASPOVICE
 & SIMONS, a law corporation, SUTTER
 BAY HOSPITALS dba SUTTER
 MEDICAL CENTER OF SANTA ROSA,
 and DOES 1 through 20,

Defendants.

SUTTER BAY HOSPITALS dba SUTTER
 MEDICAL CENTER OF SANTA ROSA,

Cross-Complainant,

v.

TRINA BOWEN, M.D., WEST COUNTY
 HEALTH CENTERS, INC., and ROES 1-
 10,

Cross-Defendants.

Civil Action No. C11-4319 LB

**STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING FEDERAL
 CROSS-DEFENDANTS' TIME TO
 RESPOND TO CROSS-COMPLAINT**

STIP. & ~~PROPOSED~~ ORDER EXTENDING FED. CROSS-DEF'S TIME TO RESPOND
 TO CROSS-COMPL.

C11-4319 LB

1 Defendant/cross-complainant Sutter Bay Hospitals dba Sutter Medical Center of Santa
 2 Rosa (hereinafter, "Sutter" or "defendant/cross-complainant") and the federal cross-defendants
 3 Trina Bowen, M.D. and West County Health Centers, Inc., by and through their counsel of
 4 record, hereby stipulate and agree as follows:

5 1. Plaintiff Jasper Gonzales, a minor, by and through his guardian ad litem, Jenna
 6 Gonzales, (hereinafter, "plaintiffs") filed a complaint against defendant Rick Simons and the law
 7 firm of Furtado, Jaspovice & Simons in the Superior Court of California, County of Sonoma, on
 8 or about December 21, 2010.

9 2. On or about February 2, 2011, plaintiffs filed a first amended complaint, adding Sutter
 10 as a defendant.

11 3. On or about June 17, 2011, Sutter filed cross-complaint against Trina Bowen, M.D.,
 12 and West County Health Centers, Inc. (hereinafter, "federal cross-defendants").

13 4. On or about August 16, 2011, the United States Attorney's Office received notification
 14 from the United States Department of Health and Human Services about this pending lawsuit,
 15 and the federal cross-defendants filed a notice of removal on August 31, 2011.

16 5. To allow the federal cross-defendants sufficient to respond to the cross-complaint,
 17 defendant/cross-complainant Sutter and federal cross-defendants stipulate and agree to extend the
 18 federal cross-defendants' time to respond to the cross-complaint in the above-captioned case by
 19 30 days, until October 7, 2011.

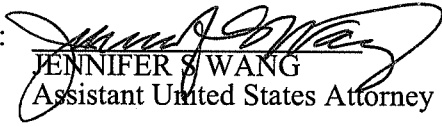
20 IT IS SO STIPULATED.

21
 22 DATED: September 7, 2011

Respectfully submitted,

23 MELINDA HAAG
 24 United States Attorney

25 By:


26 
 JENNIFER S. WANG
 Assistant United States Attorney

27
 28 STIP. & ~~PROPOSED~~ ORDER EXTENDING FED. CROSS-DEF'S TIME TO RESPOND
 TO CROSS-COMPL.

C11-4319 LB

1 DATED: September 7, 2011

2 By:



TROY VAHIDI
LA FOLLETTE, JOHNSON, DE HAAS,
FESLER & AMES
Attorneys for Defendant and Cross-Complainant
Sutter Bay Hospitals dba Sutter Medical Center of
Santa Rosa

3
4
5
6
7
8 ~~PROPOSED~~ ORDER

9 Pursuant to stipulation, and good cause having been shown, it is ordered that the federal cross-
10 defendants' deadline to respond to defendant/cross-complainant's cross-complaint in the above-
11 captioned matter is extended to October 7, 2011.

12 IT IS SO ORDERED.

13
14 Dated: September 9, 2011


LAUREL BEELER
UNITED STATES MAGISTRATE JUDGE

15
16
17
18
19
20
21
22
23
24
25
26
27
28
STIP. & ~~PROPOSED~~ ORDER EXTENDING FED. CROSS-DEF'S TIME TO RESPOND
TO CROSS-COMPL.
C11-4319 LB